

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

SYMPHONY HEALTH SOLUTIONS  
CORPORATION, SOURCE  
HEALTHCARE ANALYTICS LLC, and  
IMPACTRX, INC.,

Civil Action No. 13-4290

Plaintiffs,

Hon. Gerald A. McHugh

v.

IMS HEALTH INCORPORATED,

Defendant.

FILED  
OCT 31 2014  
MICHAEL E. KUNZ, Clerk  
By \_\_\_\_\_ Dep. Clerk

**STIPULATION AND ORDER REGARDING THE PRODUCTION OF  
CONTRACTS UNDER THE PROTECTIVE ORDER**

Dated: October 29, 2014

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WHEREAS each party to this action has requested that other parties produce in discovery certain contracts with third parties, including customers and suppliers;

WHEREAS the parties currently anticipate producing thousands of these contracts, many of which are subject to various types of contractual confidentiality and notice provisions;

WHEREAS these contracts, when produced, will be designated Highly Confidential under the Protective Order entered in this action, which designation will provide strict limitations on the use and disclosure of the contracts in order to protect the confidentiality of the contract provisions and, specifically, will limit their distribution to outside counsel and two designated company counsel, each of whom may use the documents for the purposes of this litigation only and for no commercial purpose whatsoever;

THEREFORE, the parties respectfully request that the Court enter the following order:

**ORDER**

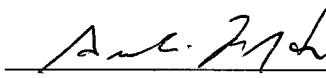
**It is HEREBY ORDERED THAT:**

Each party may produce to the other parties confidential information, including customer and supplier contracts and related information, which cannot be produced without a Court order directing their production because of contractual confidentiality provisions. To the extent any provision requires a producing party to give notice or obtain consent, in any form or manner, from any person or entity before disclosure, the Court finds that, in view of the Protective Order entered in this action, the volume of documents to be produced, and the ongoing oversight of the Court, there is good cause to excuse such requirements, and this Order shall constitute an express direction that the producing party is exempted from having to notify and/or obtain consent from any person or entity prior to the disclosure of the contracts and related information.

All contracts with confidentiality or notice provisions shall be designated Highly Confidential under the Protective Order and, accordingly, shall not be disclosed except to outside counsel and two designated company counsel, each of whom may use the documents for the purposes of this litigation only and for no commercial purpose whatsoever.

**IT IS SO ORDERED.**

Dated: 10/31/14, 2014

  
\_\_\_\_\_  
GERALD A. MCHUGH  
United States District Judge